The American Fuel & Petrochemical Manufacturers (AFPM) recently filed comments opposing the EPA's proposed rules to identify and regulate new uses for components of pyrolysis oil. These proposals will drag our country behind as the rest of the world works toward plastic circularity.

Pyrolysis oil allows petrochemical manufacturers and recyclers to reduce the need for virgin petroleum-based feedstocks. Our industries cannot reap the benefits of advanced recycling without being able to take advantage of the substance's broad uses, especially as a feedstock to make building blocks for new plastics.

The proposals fail to meet several requirements set by the Toxic Substances Control Act (TSCA). Most notably, they use Sec. 5 of the act to restrict the use of existing chemicals (commonly used as plastics additives to enhance performance of the products being made) by forcing pyrolysis oil products that contain even trace amounts of these substances into the EPA's review process for new chemicals. This is an erroneous use of the statute, as Congress created Sec. 6 to regulate existing chemicals.

The agency is already far behind in its reviews, with a list of nearly 400 chemicals in their backlog. Adding pyrolysis oil derivatives to the list will slow the entry of recycled materials into the marketplace, at a time when demand far exceeds supply, and will stifle American innovation in circularity and advanced recycling.

AFPM's members are spearheading advanced recycling and are committed to safely combating plastic pollution. The United States has the potential to make a meaningful impact in our shared mission to eliminate plastic waste, but the EPA's proposals, if adopted, will drastically impede that progress.

The EPA must reconsider the proposed rules and work more closely with stakeholders to develop reasonable regulations that enable U.S. petrochemical manufacturers and recyclers to lead the world in plastic circularity.

AFPM's full comments to the EPA are available here.

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About AFPM:

The American Fuel & Petrochemical Manufacturers (AFPM) is the leading trade association representing the makers of the fuels that keep us moving, the petrochemicals that are the essential building blocks for modern life, and the midstream companies that get our feedstocks and products where they need to go. We make the products that make life better, safer and more sustainable — we make progress.

Topics

Toxic Substances Control Act (TSCA)

Petrochemical Products